

Peter L. Tracey  
PTracey@perkinscoie.com  
D. +1.202.434.1686  
F. +1.202.654.9688

November 12, 2020

***VIA ECF***

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square, Room 1106  
New York, New York 10007

**Re: *Starr Indemnity & Liability Co. v. Marine Environmental  
Remediation Group, LLC, Case No. 17 CIV 9881 (LGS)***

Dear Judge Schofield:

Defendant Marine Environmental Remediation Group, LLC (“MER”) is providing this status report pursuant to the Court’s July 2, 2019 Order. Please be advised that MER’s bankruptcy case remains pending in the United States Bankruptcy Court for the District of New Jersey. Nothing contained herein or the filing of this report shall be deemed a waiver of the automatic stay created by 11 U.S.C. Section 362 or any other jurisdictional defenses or issues, all of which are entirely reserved.

Respectfully submitted,

/s/ Peter L. Tracey

Peter L. Tracey

cc: Guerric S.D.L. Russell, Esquire (via ECF)  
Terry L. Stoltz, Esquire (via ECF)  
Kevin O’Malley, Esquire (via ECF)  
Nicoletti Hornig & Sweeney  
Schuyler S. Carroll, Esquire (via ECF)  
Loeb & Loeb LLP